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*Counsel for Ad Hoc Group of Subrogation  
Claim Holders*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

*\*All papers shall be filed in the lead  
case, No. 19-30088 (DM)*

Case No. 19-30088  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**DECLARATION OF BENJAMIN P.  
MCCALLEN IN SUPPORT OF AD HOC  
GROUP OF SUBROGATION CLAIM  
HOLDERS' OBJECTION TO DEBTORS'  
MOTION PURSUANT TO 11 U.S.C.  
§§105(a) AND 502(c) FOR THE  
ESTABLISHMENT OF WILDFIRE  
CLAIMS ESTIMATION PROCEDURES**

[Relates to Docket No. 3091]

Date: August 14, 2019  
Time: 9:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 I, Benjamin P. McCallen, declare as follows:

2 1. I am a member of the firm Willkie Farr & Gallagher LLP. I am counsel to certain  
3 members of the Ad Hoc Group of Subrogation Claim Holders (the “**Ad Hoc Subrogation**  
4 **Group**”). I submit this Declaration in Support of the Ad Hoc Subrogation Group’s Objection to  
5 Debtors’ Motion Pursuant to 11 U.S.C. §§ 105(a) and 502(c) for the Establishment of Wildfire  
6 Claims Estimation Procedures.  
7

8 2. Attached hereto as Exhibit 1 is a true and correct copy of the Joint Case Management  
9 Conference Statement, *California North Bay Fire Cases*, JCCP No. 4955 (Cal. Super. Oct. 22,  
10 2018).

11 3. Attached hereto as Exhibit 2 is a true and correct copy of the Case Management  
12 Order No. 4, *California North Bay Fire Cases*, JCCP No. 4955 (Cal. Super. Nov. 2, 2018).

13 4. Attached hereto as Exhibit 3 is a true and correct copy of the Master Complaint for  
14 the Subrogation Plaintiffs, *California North Bay Fire Cases*, JCCP No. 4955 (Cal. Super. Mar. 12,  
15 2018).  
16

17 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
18 and correct and that I would be competent to testify thereto if called upon to do so.  
19

20 Executed on the 7th day of August, 2019 at New York, New York.  
21

22 /s/ Benjamin P. McCallen

23 Benjamin P. McCallen  
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